

**UNITED STATES BANKRUPTCY COURT**  
**EASTERN DISTRICT OF PENNSYLVANIA**

**In re:** Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Sandra V. Adams

**Debtor(s)**

PNC Bank, National Association

**Movant(s)**

v.

Sandra V. Adams

Thomas R. Adams (Non-Filing Co-Debtor)

**Respondent(s)**

Scott F. Waterman, Esquire

Standing Chapter 13 Trustee

**Additional Respondent**

**Chapter 13**

**Case No.** 22-11734-PMM

**Matter:** Motion for Relief from the Automatic Stay

**Document No.** 47

**DEBTOR(S)' RESPONSE TO MOVANT(S)' MOTION  
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come the Debtor(s), Sandra V. Adams, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Response to Movant(s)' Motion for Relief from the Automatic Stay and aver as follows:

1. Admitted.

2. Admitted.

3. Upon information and belief, the averment as stated in Paragraph 3 is admitted.

4. Admitted.

5. Upon information and belief, the averment as stated in Paragraph 5 is admitted.

6. Paragraph 6-1 contains a conclusion of law to which no response is required.

6. Upon information and belief, the averments as stated in Paragraph 6-2 are admitted. By way of further response, Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.

7. Upon information and belief, the averment as stated in Paragraph 7 is admitted. By way of further response, Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties.

8. Paragraph 8 contains a conclusion of law which no response is required.

9. Denied. Debtor(s) are without knowledge as to the truth of the averment as stated in Paragraph 9; therefore, it is denied.

WHEREFORE, Debtor(s) requests this Court deny the requested relief.

Respectfully submitted,  
**DETHLEFS PYKOSH & MURPHY**

Date: August 21, 2023

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire  
PA ID No. 201207  
2132 Market Street  
Camp Hill, PA 17011  
(717) 975-9446  
pmurphy@dplglaw.com  
*Attorney for Debtor(s)*

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**CERTIFICATE OF SERVICE**

I hereby certify that on Monday, August 21, 2023, I served a true and correct copy of the **Debtor(s)' Response to Movant(s)' Motion for Relief from the Automatic Stay** in this proceeding via electronic means upon the following:

Michael Farrington, Esquire  
KML Law Group, PC  
701 Market Street, Suite 5000  
Philadelphia, PA 19106  
*Counsel for Movant(s)*

Scott F. Waterman, Esquire  
Standing Chapter 13 Trustee  
2901 Saint Lawrence Avenue  
PO Box 4010  
Reading, PA 19606

Office of the United States Trustee  
Robert NC Nix, Sr. Federal Building  
900 Market Street, Suite 320  
Philadelphia, PA 19107

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P.  
Paralegal for Paul D. Murphy-Ahles, Esquire